ASSOCIATION OF
FEDERAL COMMUNICATIONS CONSULTING ENGINEERS
WASHINGTON, D.C.

October 21, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Comments of Association of Federal Communications Consulting Engineers (AFCCE)

Dear Mr. Caton:

Enclosed are 11 copies (original and 10) of the response by the Association of Federal Communications Consulting Engineers (AFCCE) regarding WT Docket No. 96-86, In the Matter of The Development of Operational, Technical, and Spectrum Requirements for Meeting Federal, State, and Local Public Safety Agency Communication Requirements Through the Year 2010.

If there are any questions, please do not hesitate to contact this office.

Sincerely,

Sid Khanna.

S. K. Khanna

SKK:mcw
Enclosure

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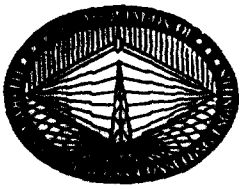


ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D. C.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
	)	
The Development of Operational,	)	WT Docket No. 96-86
Technical, and Spectrum	)	
Requirements for Meeting	)	
Federal, State, and Local Public	)	
Safety Agency Communication	)	
Requirements Through the	)	
Year 2010	)	

Comments of the Association of
Federal Communications Consulting Engineers

These comments on the Notice of Proposed Rule Making (NPRM) in the above captioned proceeding are submitted by the Association of Federal Communications Consulting Engineers (AFCCE). The AFCCE is a professional organization whose members are professional engineers practicing as consultants to segments of the communications industry, communications company engineering executives, representatives of equipment manufacturers, and others working in the communications arena. The AFCCE has a long history of participation in FCC rule making proceedings dating back to its founding nearly 50 years ago. The AFCCE welcomes the opportunity to submit comments to the FCC in this proceeding.

AFCCE supports the FCC's review of present deficiencies in Public Safety wireless communications. Because of the special nature of their missions, Public Safety agencies often have unique communication needs in terms of security, coverage, reliability, functionality and interoperability. To address these concerns, the FCC and the National

Telecommunications and Information Administration (NTIA) of the Department of Commerce established the Public Safety Wireless Advisory Committee (PSWAC). The PSWAC, consisting of senior members of Public Safety agencies, representatives of Public Safety organizations, and members of the private sector, is chartered to advise the FCC and NTIA on a variety of issues related to Public Safety wireless communications. Much work has gone into the PSWAC process, with consensus reached by a wide range of parties on many issues. Based on the excellent work of the PSWAC, the FCC should place great weight on its Final Report recommendations.

To provide Public Safety with improved communications — higher quality transmission, access to emerging technologies, and availability of a broader range of services — PSWAC converges on several general approaches. Reallocation of spectrum from other uses and/or adding Public Safety uses to already allocated bands through sharing can bring relief from spectrum crowding, as can more efficient use of present spectrum through reliance on advancing technology that will bring increases in capacity and quality as well as enhanced interoperability.

Encouraging Public Safety agencies to make greater use of communications capacity available in the commercial sector can help as well. The PSWAC Steering Committee recognizes the changing role of commercial services in supporting Public Safety communications. Public Safety agencies can establish needs and priorities based on their requirements, and utilize those commercial services which fill those needs.

The PSWAC Steering Committee makes the following recommendations, which the AFCCE supports:

- Streamline the FCC licensing process through the utilization of electronic filing.
- Through a flexible regulatory environment, encourage the development of shared system infrastructures supporting Public Safety communications.
- Foster interoperability through a variety of means, such as connection between systems using different technologies or operating in a different part of the radio spectrum, or through establishment of a minimum baseline interoperability technology standard for Public Safety radio equipment. These connections and standards should be developed by a fair and open process, and industry should be encouraged to cooperate in order to provide the tools and technology needed by the Public Safety community.

- Providing broader discretion to users is essential to affording incentives for use of advanced technologies. It should be up to the user to determine what information to send, what technology to use, the quality of the transmission demanded, and the speed required.

- The Steering Committee seeks to foster an environment where innovation and competition will respond directly to Public Safety's needs, instead of evolving from the regulatory process. Moreover, the Steering Committee believes that, in this environment, Public Safety agencies will more likely undertake efficiency efforts themselves.

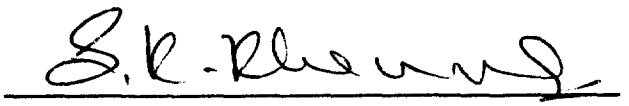
The benefits brought about by advanced technology at economical prices will come more quickly if the market for Public Safety dispatch equipment is not dominated by one manufacturer. There is significant evidence that this is not the case today, and that Public Safety standard setting processes, in particular APCO Project 25, are producing flawed results that increase the level of concentration and reduce competition and technological innovation in the Public Safety equipment market.[1] The finest technology in the world is not helpful if it is prevented from emerging by monopolistic market forces. Any rules as a result of this proceeding should be technology neutral.

The dominant supplier of public safety radio equipment has in place proprietary analog trunked radio and console products. This limits the ability of other manufacturers to supply equipment that could be interfaced with it. Due to these intellectual property barriers, the pace of technological innovation is slowed and equipment prices are higher than necessary. As an example, the technology used in cellular telephones and public safety mobile units is virtually the same; analog cellular telephones prices are in the $300 to $400 range, but comparable public safety analog communications costs from $2,000 to $2,400. The new public safety digital equipment is quoted at $5,000.

See "Competitive Considerations Associated with APCO Project 25," Hatfield Associates, Inc., January 1996.

The public safety radio spectrum is a valuable resource that requires excellent stewardship; the public safety communications community will increase its chances of obtaining additional spectrum to the extent that it can demonstrate responsible resource, procurement and asset management.

Respectfully submitted,
Association of Federal Communications
Consulting Engineers



Sudhir K. Khanna, P.E.
President

21st day of October, 1996